Commissioners,

My name is Tim Gorman and I am an Extra class licensee, callsign ABOWR.

Petition RM-10782 makes a glaring ommission of Title 47, Part 97.1(c) when discussing the fundamental purposes of the Code of Federal Regulations. Complete removal of Element 1 testing for all licenses will leave the Commission in a position of having no positive rules and regulations in effect which meet the requirement for the Commission to provide encouragement and improvement of the Amateur Radio Service in the communication phase of the art.

According to Title 47, Part 97.1, the radio art consists of two phases, communications and technical.

Please note that in the Summary section of this proposal the following statement is made:

- Technical and rule knowledge will still be required in each license class where it is currently required.

Nothing is said in the petition about how the Commission is to go about meeting its obligation for providing encouragement and improvement of the amateur service in the communication phase of the art. Nor does the petition request that Title 47, Part 97.1 be amended to eliminate the requirement for the encouragement and improvement of the amateur service in the communication phase of the art.

This petition, therefore, cannot meet its claim of furthering the principles of Part 97, Section 97.1, Title 47.

I respectfully request that the FCC not implement the provisions of this petition.

Respectfully yours,

Tim Gorman ABOWR